

SEMERARO & FAHRNEY, LLC

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DAVID J. LORENZO,

Plaintiff

vs.

THE BOROUGH OF PALISADES PARK,
NEW JERSEY; CHONG PAUL KIM
(individually and in his official capacity as
Mayor of the Borough of Palisades Park, New
Jersey); and SUK “JOHN” MIN (Individually
and in his official capacity as a member of the
Borough Council of Palisades Park, New
Jersey), STEPHANIE S. JANG (individually
and in her official capacity as a member of
the Borough Council of Palisades Park, New
Jersey, JAE PARK (individually and in her
official capacity as a member of the Borough
Council of Palisades Park, New Jersey),

Defendants.

CIV No.: 2:23-CV-21849-CCC-JRA

A Civil Action

**NOTICE OF MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF’S
COMPLAINT ON BEHALF OF
DEFENDANTS**

To:

Clerk of the Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Richard Malagiere, Esq.
Law Office of Richard Malagiere, P.C.
250 Moonachie Road, Suite 300A
Moonachie, New Jersey 07074
Attorneys for Plaintiff

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants, The Borough of Palisades Park, Chong Paul Kim, and Suk “John” Min (“Defendants”) moves before the Hon. Claire C. Cecchi, U.S.D.J., pursuant to Fed. R. Civ. P. 7(b) and L. Civ. R. 7(m) for an Order

extending State Defendants' time to answer or otherwise respond to Plaintiffs' Complaint to June 28, 2024.

Defendants shall rely on the within Certification of Counsel being filed with this Notice of Motion, in support of this motion.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to Fed. R. Civ. P. 78.

A proposed form of Order is attached hereto.

Semeraro & Fahrney, LLC
Attorneys for Defendants

By: 
R. Scott Fahrney, Esq.,

Dated: June 6, 2024